



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

October 29, 2021

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re:    *United States v. Luis Lluberes et al., 20 Cr. 493 (VSB)***

Dear Judge Broderick:

The Government respectfully writes to request an exclusion of time from Speedy Trial Act calculations. On October 28, 2021, the Court granted the defendants' second request to adjourn the pretrial motions deadline, until December 1, 2021. (*See* Dkt. Nos. 97, 103-106, 109.) For the reasons set forth in the defendants' various letters concerning their need for additional time to consider and prepare pretrial motions, the Government requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until a control date set by the Court. Yesterday, the Government inquired with defense counsel as to their position on an exclusion of time. Counsel for Maria Aguilar, a/k/a "Maria Hewitt" and Maria Lopez consent to the request. Counsel for Luis Lluberes and Moises Lluberes have not yet responded.

APPLICATION GRANTED  
SO ORDERED *Vernon S. Broderick*  
VERNON S. BRODERICK  
U.S.D.J. 11/2/2021

The Government's request that I exclude time in the interests of justice under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) is granted through December 1, 2021. Such a continuance is necessary to allow defense counsel to prepare and file pretrial motions. I find that the ends of justice served by granting the continuance outweigh the interest of the public and Defendants in a speedy trial.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:/s/

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cc: all counsel of record (by ECF)